



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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May 24, 1991

Ms. Cindy Emmons
Director, Environmental Affairs
Kennecott Utah Copper
P.O. Box 525
Bingham Canyon, Utah 84006-0525

Dear Ms. Emmons:

Re: Meeting Between Kennecott and Division Staff on May 10, 1991, M/035/002,
Salt Lake County, Utah

The Division would like to thank you and Mr. Greg Fauquier for taking the time to meet with Division staff last Friday May 10th. This letter is written as a follow-up and summary to the discussions we initiated during this last meeting. The following are items that were discussed and the Division's interpretation of the agreements reached relative to each item:

1. **Maps** - We discussed the development of a set of maps which would provide an accurate up-to-date description of the Bingham Canyon mine site. We explained that the Division would like two sets of maps, one set at a large scale (1 inch = 500 to 600 feet), the other set at a smaller scale encompassing the entire site (1 inch = 50,000 or 100,000 inches). The maps will show areas disturbed by mining post May 1975 and areas which have been reclaimed or are under reclamation. Identification of pre-law disturbed areas that have not been subject to further mining impacts by Kennecott would also be helpful in clarifying Kennecott's ultimate reclamation liabilities.

2. **Topsoil Salvage** - According to Mr. Fauquier, topsoil salvage is now being conducted in areas where the topsoil is accessible and salvage is safe. These areas are at the toe of the younger and/or smaller dumps. The older dumps, because of their size and height are more dangerous and expand at an extremely slow rate. Their current rate of expansion and the danger posed to soil salvage at their toe, due to uncertain dump stability, do not justify salvage, at this time. Kennecott has committed to continue topsoil salvage, in front of the smaller dumps and the larger

dumps, when and where it is deemed safe and appropriate to do so. Also, Kennecott has committed to update the Division, in each year's annual report concerning active dumps, areas of soil salvage associated with these dumps, and stockpiles established or added to during salvage.

3. **Plan Revisions** - Kennecott is currently involved in, or proposing to develop areas of the Bingham Canyon mine site which would/could impact the final reclamation of these areas. Such changes include the removal of sediment materials from the Old Bingham Reservoir and the possible disposal of materials from Bingham Creek onto an area of the mine site. The Division would like a commitment from Kennecott to address these changes as plan amendments and follow through with the appropriate filing/notice requirements as explained in the Mineral's Rules. As promised, we have included a copy of our amendment and revision determination policy.

4. **Tailings Pond Stability** - Kennecott is currently reclaiming a 300-acre section of the Magna tailings pond, located at the southeast corner. According to Kennecott, the reclamation is being conducted to minimize the dust impact of the tailings facility on the town of Magna and is a normal part of the already approved operational and reclamation plan. The question of dike stability is something that the Division would like to have addressed for the eastern extent of the sediment pond. Kennecott has committed to send the Division current stability analyses of the east end of the tailings dike and supporting documentation regarding the current standard practice of step-back dike construction.

5. **Pit Boundary** - The boundary addressing the National Historic Designation for the pit is something that is still a point of some confusion. The Division has offered to contact the State Historical Society concerning the question of a specific boundary. You indicated that the boundary question may be irrelevant, if Kennecott can satisfy the state's post-mining concerns (public and environmental safety), associated with the pit. Kennecott has offered to produce a conceptual list of items which will be addressed during Kennecott's post-mine closure/stabilization plan for the pit. You also agreed to provide us with a copy of your most recent correspondence to State History regarding this issue.

We were unable to discuss several of the topics, which we had hoped to cover at the May 10th meeting. The Division would like to schedule another meeting with you to develop a fair resolution to these other questions. We would propose

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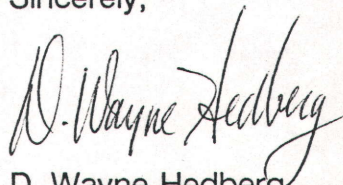
regrouping to continue our discussions during the week of June 24-28, 1991. The following items remain to be discussed:

1. The development of a program to evaluate waste dump materials.
2. The design of future and current waste dumps to accommodate better reclamation.
3. Specific reclamation techniques to be used in this year's reclamation plan (test plot design, experimental testing of seed materials seeds, soil amendments, etc.)

Please respond to each item of this letter as appropriate, either stating your concurrence or your disagreement and provide us with an acceptable date(s) for continuing our discussions.

Thank you for your cooperation and attention to these issues.

Sincerely,



D. Wayne Hedberg
Permit Supervisor/Hydrologist
Minerals Regulatory Program

jb
cc: Lowell Braxton
Minerals Staff
M035002.1